

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CR# 03-10362 PBS

SEAN D. STARK

**DEFENDANT SEAN D. STARK'S MOTION FOR LEAVE
TO FILE A SUPPLEMENTAL MEMORANDUM
OF FACT AND LAW IN SUPPORT OF HIS MOTION TO SUPPRESS
EVIDENCE SEIZED PURSUANT TO A MOTOR VEHICLE STOP**

Now comes the defendant in the above action, Sean D. Stark, and moves this Court for leave to file a Supplemental Memorandum of Fact and Law in support of his Motion to Suppress. In support thereof, the defendant states that the detective's testimony at the Suppression Hearing regarding the provisions of Missouri Law were at odds with the plain language of the statute. The government provided a copy of the statute, at the request of the Court, to undersigned counsel on May 25, 2004. The defendant wishes to submit a Supplemental Memorandum regarding the plain language of the statute, and the conduct of the Deputy in enforcing that statute. Mr. Stark further states that the Supplemental Memorandum will be less than five pages, and will not cover issues discussed in his first Memorandum.

Respectfully Submitted,



Melvin Norris

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Date: May 26, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Leave to File a Supplemental Memorandum in Support of Defendant's Motion to Suppress was served upon Assistant United States Attorney Cynthia W. Lie, Federal Courthouse, Boston, Massachusetts, on this date by first class mail, postage prepaid and Mark Shea, Esq., 47 third Street, Cambridge, Massachusetts, by fax on this date.

Date: May 26, 2004

